UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ENTERED MAR 2 2 1999

David Steele
Registered Agent
3900 W Central
Wichita, KS 67203

Dear Mr. Steele:

Re: Requirement to Provide Information on the Compliance Status of Air Capitol Plating, Inc., Pursuant to Section 114 Clean Air Act.

The United States Environmental Protection Agency (EPA) seeks information and documentation about the operations of Air Capitol Plating, Inc., in Wichita, Kansas. This information will be used to determine the compliance status of Air Capitol Plating, Inc., with the "National Emission Standard for Aerospace Manufacturing and Rework Facilities" and the "National Emissions Standard for Chromium Electroplating and Chromium Anodizing" of the Clean Air Act (Act) and other environmental statutes.

Owners or operators of aerospace manufacturing and rework facilities who are major sources are subject to the National Emission Standard for Aerospace Manufacturing and Rework Facilities, 40 C.F.R. Part 63, Subpart GG. A "major source" is one of that emits 10 tons per year of any hazardous air pollutant (HAP), or 25 tons per year of any combination of HAPs. According to §63.749 each owner or operator of an existing source subject to this subpart shall comply with the requirements of this subpart by September 1, 1998. Owners or operators of new sources subject to this subpart shall comply on the effective date or upon startup, whichever is later. In addition, each owner or operator shall comply with the compliance dates specified in §63.6(b) and §63.6(c).

Owners or operators of chromium electroplating and chromium anodizing tanks are subject to the National Emissions Standard for Chromium Electroplating and Chromium Anodizing, Tanks 40 C.F.R. Part 63, Subpart N. New or reconstructed hard chromium electroplating tanks with an initial startup after January 25, 1995, shall comply with the applicable standards immediately upon startup. According to 40 C.F.R. §63.343,

existing chromium anodizing tanks must comply with the applicable standards no later than January 25, 1997. New or reconstructed chromium anodizing tanks with an initial startup after December 16, 1993 but before January 25, 1995, shall follow the compliance schedule of 40 C.F.R. §63.6(b)(1).

Pursuant to Section 114(a)(1) of the Act, 42 U.S.C. 7414(a)(1), you are required to provide the following information and documents within fifteen (15) days of receipt of this document. Failure to respond fully and truthfully to this information request is a violation of Section 114 of the Act and would result in an enforcement action for civil penalties of up to $27,500 per day of violation, or for injunctive action, or both.

1. Identify all persons providing responses to this Information Request on behalf of Air Capitol Plating, Inc.

2. Provide the following information for each hand wipe cleaning operation at your facility involving aerospace parts or components that is not exempt under 40 C.F.R. §63.744(e).

   a. If you use or have used exempt solvent after September 1, 1998, provide the documentation required to demonstrate that the exempt status requirements of 40 C. F. R. §63.744(b)(1) or (2) have been met.

   b. After September 1, 1998, have you used any solvent that is not exempt from 40 C.F.R. §63.744(b)(1) or (2)?

   c. Have you submitted an alternative plan to the State of Kansas to reduce the HAPs and VOCs (volatile organic compounds) used for cleaning aerospace parts? If yes, please supply the plan.

   d. Please provide the quantity and composition for each compound, exempt and not exempt, used to hand wipe aerospace parts at your facility. Provide this information on a monthly basis from September 1997 through February 1999. Describe the method you used to obtain the data and provide any documents that substantiate the data.

3. For each spray gun cleaning operation at your facility involving aerospace parts, in which spray guns were used for the application of coatings or any other materials that require the spray gun to be cleaned, describe the operations as follows:

Identify each spray gun that was used to coat aerospace parts at your facility since September 1, 1998.

a. Is HAP or VOC used in the spray gun cleaning? If yes, provide the quantity and composition of solvent used by month for each type of cleaning since September 1,1998. The choices of type of cleaning can include: enclosed system, nonatomized cleaning, disassembled spray gun cleaning, and atomized cleaning.

b. Describe how these spray guns were cleaned. If atomized cleaning was used, describe the device which captured the associated atomized cleaning solvent emissions.

4. Has flush cleaning been performed at your facility since September 1, 1998, which is not excluded under 40 C.F.R. §63.744? If so, describe the quantity and composition of cleaning solvent used and the emission control measures taken.

5. For each operation at your facility after September 1, 1998, where a top coat was applied to parts and assemblies critical to the aerospace vehicle's structural integrity or flight performance:

a. List the quantity of paint used, by month, including its VOC, organic HAP content, water content, exempt solvent content, and inorganic HAPS content. Provide documentation as to the quantity of paint used.

b. Include and identify any, coatings you consider exempt, either under 40 C.F.R. §63.741(f) (Specialty Coatings), or under low volume coatings as defined in 40 C.F.R. §63.741(g).

c. For coatings you consider exempt, provide a copy of the product's primary label, If the exempt usage is not detailed provide documentation for the exempt usage.

d. Provide any documentation of an approved method for complying with 40 C.F.R. §63.745(e), If none exist, state that.

e. Describe the methods of application for each coating, your choices include but are not limited to: air atomized spray; flow/curtain coat application; dip coat application; roll coating; brush coating; cotton-tipped swab application; electrodeposition (dip) coating; high

volume low pressure (HVLP) spraying; electrostatic spray application.

6. For each operation at you facility after September 1, 1998, where primer was applied to parts and assemblies critical to the aerospace vehicle's structural integrity or flight performance:

a. List the quantity of paint used, by month, including its VOC, organic HAP content, water content, exempt solvent content, and inorganic HAPS content. Provide documentation as to the quantity of paint used.

b. Include and identify any coatings you consider exempt either under 40 C.F.R. Part 63 Subpart GG, Appendix A (Specialty Coatings), or low volume coatings as defined in 40 C. F. R. §63.741(g).

c. For coatings you consider exempt provide a copy of the product's primary label. If the exempt usage is not detailed, provide documentation for the exempt usage.

d. Provide any documentation of an approved method for complying with 40 C.F.R. §63.745. If none exists, state that.

e. Describe the methods of application for each coating, your choices include, but are not limited to: air atomized spray; flow/curtain coat application; dip coat application; roll coating; brush coating; cotton-tipped swab application; electrodeposition (dip) coating; high volume low pressure (HVLP) spraying; electrostatic spray application.

7. Is control equipment being used for capture or control of VOC or HAP emissions associated with coating operations? If so, describe the system or systems. If not, state that.

8. List all aerospace parts and assemblies you coated and considered **not** critical to the vehicle's structural integrity or flight performance.

9. List each application area where an inorganic HAP coating has been applied since March 29, 1996, and the date the application area commenced construction. Please identify any time the coating involved: touch-up of scratched surfaces or damaged paint; hole daubing for fasteners; touch-up of trimmed edges; coating prior to joining dissimilar metal components; stencil operations performed by brush or air brush; section

joining; touch-up of bushings and other similar parts; sealant detackifying; and painting parts in an area identified in a Title V permit, where the permitting authority has determined that it is not technically feasible to paint the parts in a booth.

a. Provide a detailed list of each coating applied in each of these areas, including the quantities of coating applied in each area.

b. Describe the exiting airflow in each coating operation: does it exit through a dry particulate filter system or a water wash system?

c. If the air flow exited through a filter or filter system, describe the filter system in terms of stages and filters used since September 1, 1998.
   1. Do these filters meet a specification? If so, provide the documentation.
   2. Describe any monitoring of these filters and provide copies of any monitoring records.
   3. Describe and provide documentation of any actions taken if the pressure drop across the dry particulate filter system was outside the limit(s) specified by the filter manufacturer or in locally prepared operating procedures.
   4. Provide the filter manufacture's specifications or any locally prepared operating procedures including the dates these procedures were implemented.

d. If a water wash system was used, describe the system.
   1. Were any water flow gauges on the system?
   2. Did they continuously monitor the water flow rate?
   3. Supply any documentation associated with this system.
   4. Describe and provide documentation if the water path in the waterwash system ever failed the visual continuity check.

11. List any new or existing chemical milling maskant operation that is applied directly to aluminum components to protect surface areas when chemical milling the component with a Type I or Type II etchant.

a. Describe the compliance method or methods used to meet 40 C.F.R. §63.747(e).

12. Describe the handling of any wastes at your facility that

contain HAP. Provide any procedures associated with such operations, and any revisions to these procedures, including the date the procedures were developed and the date they were implemented.

13. Provide copies of each operation and maintenance plan used to comply with 40 C.F.R. Part 63 Subpart GG. Include the original plan, the date the plan was developed and implemented and any revisions of the plan.

14. Provide the following information for each chromium electroplating and anodizing tank and control system located at each facility owned or operated by Air Capitol Plating, Inc:

a. Specify the type of tank (decorative chromium electroplating, chromium anodizing, or hard chromium electroplating).
b. Date of construction of each tank.
c. Type of pollution control system (i.e., wetting agent, foam blanket, fiber bed mist eliminator, composite mesh pad).
d. Date when the current controls were installed, and the dates when controls were updated or modified.
e. Date when controls were fully operational.
f. A copy of all performance tests. If not yet tested, state that it has not been tested.
g. A copy of each emission test, preliminary, official or unofficial.
h. Copies of the recordkeeping and reporting logs for each tank or control system for the period January 25, 1997, to date. This includes, but is not limited to, process time, control system pressure drop and flow rate, malfunction records and operation and maintenance manual. If no data exists, state that no data exists.

Send your reply within 15 days of your receipt of this letter to:

Richard W. Tripp ARTD/APCO
U.S. Environmental Protection Agency
726 Minnesota Avenue
Kansas City, Kansas 66101

If you wish to assert a claim of business confidentiality covering all or part of the information provided to EPA pursuant to this information request, such claim shall be submitted pursuant to 40 C.F.R. Part 2, Subpart B, at the time you submit the above information.

Section 113 of the Act U.S.C. §7413, of the Act gives EPA the authority to seek criminal penalties from any person who knowingly makes any false statement, representation, or certification in any report required under the Act.

This submittal of information is not subject to the provisions of the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

If you have any questions relating to this Request to Provide Information, contact Richard W. Tripp, Air Permitting and Compliance Branch, at (913) 551-7566, or Alex Chen, Office of Regional Counsel, at (913) 551-7962. We appreciate and look forward to Air Capitol Plating Inc.'s prompt response.

Sincerely,

Thomas J. Hoyn

FOR: William A. Spratlin
Director
Air, RCRA, and Toxics Division

cc: Michael H Wilson /Air Capitol Plating, Inc.
cc: Gary Miller KDHE